## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Boston Gas Company, Colonial Gas Company ) and Essex Gas Company, operating as ) D.T.E. 04-62 KeySpan Energy Delivery New England )

## ATTORNEY GENERAL'S FIRST SET OF DOCUMENT AND INFORMATION REQUESTS

- AG-1-1 Please provide redlined versions of the Colonial Gas Company's CGA and LDAF tariffs that show the proposed changes.

  AG-1-2 Please provide redlined versions of the Essex Gas Company's CGA and LDAF tariffs that show the proposed changes.
- AG-1-3 Please provide a copy of the Peak 2003/04 CGA filings for each company.
- AG-1-4 Please provide a copy of the Off Peak 2004 CGA filings for each company.
- AG-1-5 Please provide an estimated Peak 2004/05 consolidated CGA filing. Include all workpapers, supporting documents, calculations and assumptions.
- AG-1-6 Please provide an estimated Peak 2004/05 CGA for each of the companies on a stand alone basis. Include all workpapers, supporting documents, calculations and assumptions.
- AG-1-7 Please provide the calculation of the average (not class specific) Peak 2003/04 CGA for Essex Gas Company. The response should be based on the company's initial Peak 2003/04 CGA filing. Include all workpapers, supporting documents, calculations and assumptions.
- AG-1-8 Refer to Exhibit KED/EDA-1, page 8, lines 3-8. Please provide a recalculation of the 2003/04 Peak CGA (based on the original initial filing data) for each of the companies based on an appropriate allocation of costs (one that corrects the mismatch referred to in the testimony) to each of the companies. Include all workpapers, supporting documents, calculations and assumptions.
- AG-1-9 Refer to D.P.U. 96-70, Essex Gas Company. Please provide the following costs:
  - a) local production and storage costs recovered through base rates;
  - b) local production and storage costs recovered through the CGA;

- c) gas acquisition, planning and dispatch costs recovered through base rates;
- d) gas acquisition, planning and dispatch costs recovered through the CGA;
- e) bad debt costs recovered through base rates;
- f) bad debt costs recovered through the CGA; and
- g) the working capital allowance for each of the above costs that is recovered through base rates.

Include all supporting details by account number, the calculation and development of each allocator used to allocate costs between base rates and CGA, and the calculation and development of all related peak and off peak allocators.

- AG-1-10 Refer to D.P.U. 93-78 and D.T.E. 98-64, Colonial Gas Company. Please provide (separately, for each the Cape and Lowell divisions) the following:
  - a) local production and storage costs recovered through base rates;
  - b) local production and storage costs recovered through the CGA;
  - c) gas acquisition, planning and dispatch costs recovered through base rates;
  - d) gas acquisition, planning and dispatch costs recovered through the CGA:
  - e) bad debt costs recovered through base rates;
  - f) bad debt costs recovered through the CGA; and
  - g) the working capital allowance for each of the above costs that is recovered through base rates.

Include all supporting details by account number, the calculation and development of each allocator used to allocate costs between base rates and CGA, and the calculation and development of all related peak and off peak allocators.

- AG-1-11 Refer to D.T.E. 03-40, Boston Gas Company. Please provide the following:
  - a) local production and storage costs recovered through base rates;
  - b) local production and storage costs recovered through the CGA;
  - c) gas acquisition, planning and dispatch costs recovered through base rates;
  - d) gas acquisition, planning and dispatch costs recovered through the CGA;
  - e) bad debt costs recovered through base rates;
  - f) bad debt costs recovered through the CGA; and
  - g) the working capital allowance for each of the above costs that is recovered through base rates.

Include all supporting details by account number, the calculation and development of each allocator used to allocate costs between base rates and CGA, and the calculation and development of all related peak and off peak allocators.

AG-1-12 Please provide for each, Boston Gas Company, Colonial Gas Company-Lowell, Colonial Gas Company-Cape and Essex Gas Company, the working capital

calculations for each individual working capital component of the Peak 2003/04 CGA. Include all detailed supporting workpapers, calculations, assumptions and copies of the most recent DTE orders approving each working capital allowance.

- AG-1-13 Please provide a copy of the Department's order approving <u>each</u> of the companies' gas inventory financing arrangements. Explain how each company computes interest on gas inventories and how and through which rate elements the inventory financing costs are recovered by each company.
- AG-1-14 Refer to Exhibit KED/EDA-1, page 21 and Exhibit KED/EDA-6. Please explain how the "Stand-alone" and "Incremental Demand" costs were determined for each company. Provide copies of all supporting documents, workpapers, calculations and assumptions.
- AG-1-15 Refer to Exhibit KED/EDA-1, page 22, lines 14-18. Please provide the tariff language in the current CGA's that does not "enable the Company to charge the appropriate costs to Colonial and Essex customers." Also, provide citations to the Department's precedent that would prohibit the appropriate allocation.
- AG-1-16 Refer to the data filed in D.T.E. 03-40, Boston Gas Company's most recent rate case. Provide total test year costs related to each of the functions:
  - a) gas acquisition and dispatch,
  - b) local production and storage, and
  - c) related cash working capital.

Provide the allocation of the total (fully loaded) costs for these costs to each of the companies, Boston, Colonial and Essex. Provide the amount for each category that was incurred directly by the Company and amounts that were incurred by the service company. Provide the details of all allocation factors.

- AG-1-17 Refer to Exhibit KED/AEL-3 and Exhibit KED/AEL-10. Please provide bill impact analyses that include the impact of the proposed consolidation of the companies' LDAFs.
- AG-1-18 Please explain each of the companies' current margin sharing provisions and how they will change under the Company's proposal. Include the details of specific calculations and threshold determinations. Identify which margins flow through the CGA and which through the LDAF. Based on the companies' most recent CGA filings, provide an illustration of the effect of the proposal.